

LAW OFFICE OF ANDREW M. LEAVITT, ESQ.
Robert F. Purdy (NV Bar No. 6097)
633 South Seventh Street
Las Vegas, NV 89101
Telephone: (702) 382-2800
Facsimile: (702) 382-7438
Robert.purdy@andrewleavittlaw.com

Jonathan M. Shapiro
AETON LAW PARTNERS LLP
311 Centerpoint Drive
Middletown, Connecticut 06475
Telephone: (860) 724.2160
jms@aetonlaw.com

Attorneys for Plaintiffs in Courtmanche v. Permian Resources, Corp., et al.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRIAN COURTMANCHE, LAURA J. FABER, PATRICIA MANCIERI, DAVID SILVER, and JOSSELYN'S GETAWAY LOG CABINS, LLC, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP. f/k/a CENTENNIAL RESOURCE DEVELOPMENT, INC.; CHESAPEAKE ENERGY CORPORATION; CONTINENTAL RESOURCES INC.; DIAMONDBACK ENERGY, INC.; EOG RESOURCES, INC.; HESS CORPORATION; OCCIDENTAL PETROLEUM CORPORATION; and PIONEER NATURAL RESOURCES COMPANY,

Defendants.

FREED KANNER LONDON & MILLEN LLC

Matthew W. Ruan (*pro hac vice* submitted)
Douglas A. Millen (*pro hac vice* submitted)
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Telephone: (224) 632-4500
mruan@fkmlaw.com
dmillen@fkmlaw.com

Case No.: 2:24-cv-00198-JAD-MDC

**MOTION FOR THE EXTENSION OF
TIME TO FILE PRO HAC VICE
APPLICATION/VERIFIED PETITION
AND DESIGNATION OF LOCAL
COUNSEL FOR COUNSEL JONATHAN
M. SHAPIRO
(Second Request)**

1 Plaintiffs Brian Courtmanche, Laura J. Faber, Patricia Mancieri, David Silver, and Josselyn's
2 Getaway Log Cabins LLC, individually and on behalf of all others similarly situated in *Courtmanche et*
3 *al. v. Permian Resources Corp., et al.*, hereby request an additional thirty (30) day extension of the time
4 for Plaintiffs' Counsel, Jonathan M. Shapiro, to file his Pro Hac Vice Application/Verified Petition and
5 Designation of Local Counsel with the Court.

6 This request complies with L.R. I.A. 6-1. This is the Plaintiffs' second request for an extension
7 of time for the filing of the Pro Hac Vice Application/Verified Petition and Designation of Local Counsel
8 for counsel, Jonathan M. Shapiro. Plaintiffs filed their complaint on January 29, 2024 (ECF No. 1). The
9 initial deadline for Counsel to submit their completed Pro Hac Vice Applications/Verified Petitions and
10 Designation of Local Counsel was February 12, 2024 (ECF Nos. 3-9). On February 13, 2024, an
11 extension was granted to March 13, 2024 for all Plaintiff's proposed local counsel to submit their Pro
12 Hac Vice Applications/Verified Petitions and Designation of Local Counsel. (ECF No. 22). Plaintiffs'
13 counsel, Matthew W. Ruan and Douglas A. Millen filed their Pro Hac Vice Applications/Verified
14 Petitions and Designation of Local Counsel on March 13, 2024. (ECF No. 28 and 29). Plaintiffs will
15 not be filing Pro Hac Vice Applications/Verified Petitions and Designation of Local Counsel for counsel:
16 Michael E. Moskovitz, Nia Barberousse Binns, Kimberly A. Justice, and Jonathan M. Jagher, who were
17 listed on the Plaintiff's complaint as "pro hac vice forthcoming." These four listed counsel will not be
18 appearing in this action and are members of the same law firm as Matthew W. Ruan and Douglas A.
19 Millen, who submitted their Pro Hac Vice Applications/Verified Petitions and Designation of Local
20 Counsel on March 13, 2024. (ECF No. 28 and 29).

21
22 Plaintiffs' counsel, Jonathan M. Shapiro, is requesting this extension due to a delay in receiving
23 his Certificate of Good Standing from the Connecticut Bar Association, which was requested shortly after
24 Plaintiffs' complaint was filed. Therefore, good cause exists for the requested extension. The requested

25 //

26
27 //

extension furthers the interest of this litigation and is not being requested in bad faith or to delay these proceedings unnecessarily.

Dated: March 13, 2024

By: /s/ Robert F. Purdy

Robert F. Purdy (NV Bar No. 6097)
633 South Seventh Street
Las Vegas, NV 89101
Telephone: (702) 382-2800
Facsimile: (702) 382-7438
Robert.Purdy@andrewleavittlaw.com

Local Counsel for Plaintiffs and the Proposed Classes

Matthew W. Ruan
Douglas A. Millen
**FREED KANNER LONDON
& MILLEN LLC**
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Telephone: (224) 632-4500
mruan@fklmlaw.com
dmillen@fklmlaw.com

Jonathan M. Shapiro
AETON LAW PARTNERS LLP
311 Centerpoint Drive
Middletown, Connecticut 06475
Telephone: (860) 724-2160
jms@aetonlaw.com

Counsel for Plaintiffs and the Proposed Classes

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: March 14, 2024